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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

TODD VANDEHEY,

Plaintiff,

v.

TRANSUNION, LLC, EXPERIAN  
INFORMATION SOLUTIONS, INC., AND  
AMERICAN EXPRESS COMPANY,

Defendants.

Case No. 2:21-cv-02132-GMN-BNW

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

Plaintiff Todd Vandehey ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

1. On December 1, 2021, Plaintiff filed his Complaint. Trans Union was served with Plaintiff's Complaint on December 6, 2021. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is December 27, 2021.

2. On December 21, 2021, counsel for Trans Union communicated with Plaintiff's counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel agreed to the extension.

3. The parties will actively discuss a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties' time and expense. The additional time will allow Plaintiff and Trans Union time to fully explore such early settlement discussions.

4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.

5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including January 26, 2022. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 22nd day of December 2021.

**QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.**

/s/ Jennifer Bergh

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**COUNSEL FOR TRANS UNION LLC**

**ORDER**

**IT IS SO ORDERED**

**DATED:** 10:41 am, December 27, 2021



**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**

**CONTEMPORARY LEGAL SOLUTIONS PLLC  
AND MARCUS & ZELMAN, LLC**

/s/ Yitzchak Zelman

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